

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

CITY OF ALMATY, KAZAKHSTAN and BTA  
BANK JSC,

Plaintiffs,

-against-

MUKHTAR ABLYAZOV, VIKTOR  
KHRAPUNOV, ILYAS KHRAPUNOV, and  
TRIADOU SPV S.A.,

Defendants.

15 Civ. 5345 (JGK) (KHP)

**DECLARATION OF CRAIG WENNER**

1. I am an attorney duly licensed to practice law in the State of New York and am a Partner with the law firm of Boies Schiller Flexner LLP (“Boies Schiller Flexner” or the “Firm”), counsel for Plaintiffs City of Almaty and BTA Bank JSC. I submit this declaration in support of Plaintiffs’ Motion for Approval of Application for Attorneys’ Fees and Costs, in accordance with the Court’s August 6, 2025 Order granting Plaintiffs’ motion for contempt against Ilyas Khrapunov and requiring Khrapunov “to reimburse the plaintiffs for attorney’s fees and costs in connection with this motion for contempt.” [ECF No. 1820 at 3.]

2. Plaintiffs seek fees for the work of the following individuals: Matthew Schwartz, Peter Skinner, Craig Wenner, and Sophie Roytblat. Their professional qualifications follow, by way of background.

3. Matthew Schwartz. Mr. Schwartz is the Chairman and a Managing Partner at Boies Schiller Flexner, specializing in government and internal investigations, white collar defense,

regulatory compliance, and complex civil litigation. He received both his B.A. and J.D. from Columbia University; he graduated from Columbia Law School as a Harlan Fiske Stone scholar. He clerked for the Honorable Shira A. Scheindlin on the United States District Court for the Southern District of New York in 2002-04, and for the Honorable Thomas J. Meskill on the United States Court of Appeals for the Second Circuit in 2004-05. Between 2005 and 2015, he was an Assistant United States Attorney for the Southern District of New York, where as a member of that office's Securities and Commodities Task Force he handled numerous investigations involving fraud, money laundering, and violations of the Bank Secrecy Act, including leading all aspects of the government's investigation and asset recovery effort arising from the fraud at Bernard L. Madoff Investment Securities. He joined Boies Schiller Flexner as a partner in January 2015, and is admitted to the bar in New York and in this Court, among other places. As the Court is aware, he has been the lead lawyer on this case on behalf of Plaintiffs since it was filed. As of 2025, Mr. Schwartz's hourly rate is \$1,710.00.

4. Peter Skinner. Mr. Skinner is a partner at Boies Schiller Flexner. He received a B.A. from the University of Notre Dame and a J.D. from Boston College Law School. Mr. Skinner served from 2004 until 2015 as an Assistant United States Attorney for the Southern District of New York, where he was a senior prosecutor in the Terrorism and International Narcotics Unit and the Organized Crime Unit and handled numerous investigations involving fraud and money laundering. In addition to his work as a criminal prosecutor, Mr. Skinner served for four years in the Civil Division of the U.S. Attorney's Office, where he advised the intelligence community on litigation affecting national security and handled a variety of complicated civil matters. Mr. Skinner also joined Boies Schiller Flexner in 2015 and is admitted to both the bars of New York and this Court, among other places. As of 2025, Mr. Skinner's hourly rate is \$1,530.00.

5. Craig Wenner. Mr. Wenner is a partner at Boies Schiller Flexner. He received his J.D. from New York University School of Law in 2011. He obtained his bachelor's degree from Tufts University. After graduating from law school, Mr. Wenner served as a law clerk to the Honorable Harold Baer, Jr. on the United States District Court for the Southern District of New York, and as a postgraduate fellow in the Frank J. Guarini Center on Environmental and Land Use Law at N.Y.U. School of Law. Mr. Wenner joined Boies Schiller Flexner in 2013 as an associate and was elected to the partnership effective January 2020. Mr. Wenner's litigation experience is varied, having represented both plaintiffs and defendants in a wide array of complex commercial disputes, regulatory investigations, and white-collar criminal defense matters. He is admitted to practice in the State of New York, and before this Court. Mr. Wenner managed all aspects of this litigation. As of 2025, Mr. Wenner's hourly rate is \$1,270.00.

6. Sophie Roytblat. Ms. Roytblat is an associate at Boies Schiller Flexner. She obtained her B.S. *cum laude* from New York University in 2017, and her J.D. from Fordham University School of Law in 2022. Between 2017 and 2019, Ms. Roytblat was a paralegal at Boies Schiller Flexner, where she worked on this case. She rejoined the Firm in 2022, immediately after law school. She is admitted to practice in the state of New York, and before this Court. As of 2025, Ms. Roytblat's hourly rate is \$860.00.

7. Among other things, the professional qualifications above are provided in support of the hourly rates requested by Plaintiffs. Boies Schiller Flexner is representing Plaintiffs in this action on a billable-hour basis. The Firm provides an hourly rate for each attorney and legal staff member based on their function, title, and years of experience. I am one of the partners responsible for managing the case and overseeing the work done by attorneys and paralegals on the matter. Timekeepers are required to keep contemporaneous records of their time spent on tasks, with diary

entries submitted in the Firm's timekeeping software. I review the monthly bills that are generated for the clients which reflect the work done and time spent on each task. Plaintiffs have presented rates in their fee application that reflect amounts lower than the actual fees charged to their clients in this matter. The fees were discounted to the rates previously approved by Judge Parker in prior sanctions rulings in this case and do not reflect the current rates charged to Plaintiffs, which are significantly higher. [See ECF Nos. 628, 1216, 1494, 1779].

8. Plaintiffs incurred fees for several categories of legal work in connection with their motion for contempt against Ilyas Khrapunov. Those categories are: (1) the initial briefing on Plaintiffs' motion for contempt; (2) preparation for and attendance at the evidentiary hearing before Judge Parker; (3) post-hearing briefing before Judge Parker; (4) preparation for and attendance at the *de novo* hearing ordered by this Court; and (5) preparation of this fee application.

9. The spreadsheet attached to this declaration as Exhibit 1 contains selected diary entries taken directly from the monthly client bills generated in this matter.

10. Plaintiffs are not seeking reimbursement for paralegal assistance and costs, such as printing and legal research costs, associated with the hearings.

11. Where noted with asterisks in the spreadsheets, attorneys' fees have been reduced for the reasons explained in the accompanying Memorandum of Law in Support of Plaintiffs' Motion for Approval of Application for Attorneys' Fees and Costs and in the spreadsheets themselves. The fees incurred by Plaintiffs in connection with the contempt motion at their regular hourly rates totaled \$221,726.00.

12. In lieu of submitting redacted spreadsheets, I have shortened the description of a handful of time entries to preserve attorney-client privilege. The full time entries can be made available to the Court *in camera*.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on: August 20, 2025  
New York, NY

Respectfully,

/s/ Craig Wenner  
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